

# Exhibit 1

**From:** Tarbutton, J. Scott  
**To:** Omar Mohammedi, Esq.; fgoetz@goetzeckland.com  
**Cc:** Carter, Sean; "Haeefe, Robert" (rhaefe@motleyrice.com); WTC[jkreindler@kreindler.com]; WTC[amaloney@kreindler.com]; Steven R. Pounian; WTC[jgoldman@andersonkill.com]; Jill Mandell  
**Subject:** RE: 03 MDL 1570  
**Date:** Wednesday, April 17, 2019 2:41:53 PM

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Omar – I will confer with other members of the PECs and get back to you.

Regards,

Scott



**J. Scott Tarbutton**  
**Member | Cozen O'Connor**  
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**From:** Omar Mohammedi, Esq. <OMohammedi@otmlaw.com>  
**Sent:** Wednesday, April 17, 2019 2:37 PM  
**To:** Tarbutton, J. Scott <STarbutton@cozen.com>; fgoetz@goetzeckland.com  
**Cc:** Carter, Sean <SCarter1@cozen.com>; 'Haeefe, Robert' (rhaefe@motleyrice.com) <rhaefe@motleyrice.com>; WTC[jkreindler@kreindler.com] <jkreindler@kreindler.com>; WTC[amaloney@kreindler.com] <amaloney@kreindler.com>; Steven R. Pounian <Spounian@kreindler.com>; WTC[jgoldman@andersonkill.com] <jgoldman@andersonkill.com>; Jill Mandell <jmandell@otmlaw.com>  
**Subject:** RE: 03 MDL 1570

**\*\*EXTERNAL SENDER\*\***

Scott:

Thank you for your rely. WAMY agrees to produce a Rule 30 (b) (6) witness. Please confirm if this is acceptable so that we can start preparing for scheduling purpose. Thanks.

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**From:** Tarbutton, J. Scott <STarbutton@cozen.com>  
**Sent:** Wednesday, April 17, 2019 2:25 PM  
**To:** Omar Mohammedi, Esq. <OMohammedi@otmlaw.com>; fgoetz@goetzeckland.com  
**Cc:** Carter, Sean <SCarter1@cozen.com>; 'Haeefe, Robert' (rhaefe@motleyrice.com) <rhaefe@motleyrice.com>; WTC[jkreindler@kreindler.com] <jkreindler@kreindler.com>; WTC[amaloney@kreindler.com] <amaloney@kreindler.com>; Steven R. Pounian <Spounian@kreindler.com>; WTC[jgoldman@andersonkill.com] <jgoldman@andersonkill.com>; Jill Mandell <jmandell@otmlaw.com>  
**Subject:** RE: 03 MDL 1570

Omar – Mr. Alshalan submitted a declaration indicating that WAMY cannot comply with the Court's January 15, 2019 Order (ECF No. 4350) directing WAMY to produce relevant banking records, particularly from banks within Saudi Arabia. Plaintiffs reserve our right to depose Mr. Alshalan on those issues. However, plaintiffs may be willing to accept a Rule 30(b)(6) witness that can provide testimony concerning banking records and other document issues in Mr. Alshalan's place.

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**From:** Omar Mohammedi, Esq. <OMohammedi@otmlaw.com>  
**Sent:** Wednesday, April 17, 2019 1:54 PM  
**To:** Tarbutton, J. Scott <STarbutton@cozen.com>; fgoetz@goetzeckland.com  
**Cc:** Carter, Sean <SCarter1@cozen.com>; 'Haeefe, Robert' (rhaefe@motleyrice.com) <rhaefe@motleyrice.com>; WTC[jkreindler@kreindler.com] <jkreindler@kreindler.com>; WTC[amaloney@kreindler.com] <amaloney@kreindler.com>; Steven R. Pounian <Spounian@kreindler.com>; WTC[jgoldman@andersonkill.com] <jgoldman@andersonkill.com>; Jill Mandell <jmandell@otmlaw.com>  
**Subject:** RE: 03 MDL 1570

**\*\*EXTERNAL SENDER\*\***

Scott:

We are working on the dates an place convenient for witnesses. However, we just noticed that you are planning to depose Ibrahim Alshalan, WAMY's lawyer in Saudi Arabia. We thought you were planning to depose another witness with a similar name. Please know WAMY's lawyer is not a fact witness. We are opposing your request to depose him. Thank you.

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**From:** Tarbutton, J. Scott <STarbutton@cozen.com>  
**Sent:** Friday, April 12, 2019 12:52 PM

**To:** Omar Mohammedi, Esq. <[OMohammedi@otmlaw.com](mailto:OMohammedi@otmlaw.com)>; [fgoetz@goetzeckland.com](mailto:fgoetz@goetzeckland.com)

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Omar,

The PECs can confirm that we are limiting the depositions to Messrs. Saleh al Wohaibi, Abdul Wahab Noorwali, Ibrahim Anwar, and Ibrahim Alshalan. The PECs are further agreeable to conducting those depositions in July and grouping those witnesses at two per trip. While London is a suitable location for conducting the proposed depositions, a handful of depositions have taken place in Madrid in recent months and the PECs and counsel for MWL, IIRO and Dallah Avco have found the accommodations in Madrid very comfortable, easier to transit, and possibly more cost effective. We are open to discussing some of these logistical issues and others in a conference call next week if you are available. Please let us know.

Regards,

Scott

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**From:** Omar Mohammedi, Esq. <[OMohammedi@otmlaw.com](mailto:OMohammedi@otmlaw.com)>

**Sent:** Thursday, April 11, 2019 1:09 PM

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**Cc:** Carter, Sean <[SCarter1@cozen.com](mailto:SCarter1@cozen.com)>; 'Haeefe, Robert' ([rhaefe@motleyrice.com](mailto:rhaefe@motleyrice.com)) <[rhaefe@motleyrice.com](mailto:rhaefe@motleyrice.com)>; WTC[jkireindler@kreindler.com] <[jkireindler@kreindler.com](mailto:jkireindler@kreindler.com)>; WTC[amaloney@kreindler.com] <[amaloney@kreindler.com](mailto:amaloney@kreindler.com)>; Steven R. Pounian <[Spounian@kreindler.com](mailto:Spounian@kreindler.com)>; WTC[jgoldman@andersonkill.com] <[jgoldman@andersonkill.com](mailto:jgoldman@andersonkill.com)>; Jill Mandell <[jmandell@otmlaw.com](mailto:jmandell@otmlaw.com)>

**Subject:** RE: 03 MDL 1570

**\*\*EXTERNAL SENDER\*\***

Scott,

Thank you for your email. While WAMY does not object to the PECs' request to adjourn the fact deposition deadline, we need to address a few matters prior to granting such consent.

First, due to the upcoming Ramadan observance from May 5-June 4, followed by Eid al Fitr on June 6 -12, our clients and witnesses will be unavailable to participate in depositions for over a month during your proposed extension period. In addition, the period between now and Ramadan is too short to produce the witnesses for the depositions as you have not noticed us with any deposition. We are not sure why the extension request was not made before April 1, 2019 when we sent you a March 1, 2019 letter requesting that you notice WAMY witnesses. Based on the Ramadan period, the depositions will need to start after June 12. We have to address logistics, including arranging visas, work schedules, and travel accommodations. Since each of the witnesses identified below will require a translator, each deposition may take 2 days. Accordingly, we'd like to arrange the depositions in groups of 2 witnesses per trip. In addition, the month of June is hectic for us. Therefore, we propose that the two sets of depositions take place during the month of July. We are also confirming that you are limiting your depositions to the four witnesses identified below. If you are contemplating deposing other witnesses we need to solidify that now. We suggest the depositions take place in London.

Lastly, as you know, Plaintiffs' responses to WAMY's interrogatories are long overdue. There is no good basis for Plaintiffs to withhold their responses to WAMY's interrogatories as the April 1 Deadline has passed. We would like a response on this please.

Please advise whether the PECs are in agreement with the foregoing.

Thank you.

Omar Mohammedi, Esq.

Adjunct Professor, Fordham Law School

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**From:** Tarbutton, J. Scott [<mailto:STarbutton@cozen.com>]  
**Sent:** Wednesday, April 10, 2019 11:24 AM  
**To:** Omar Mohammedi, Esq.; [goetz@goetzzeckland.com](mailto:goetz@goetzzeckland.com)  
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**Subject:** 03 MDL 1570

Omar and Fred,

On behalf of the PECs, I write to advise that plaintiffs intend to ask Judge Netburn to extend the fact deposition deadline as to defendant WAMY an additional sixty days to allow the PECs to pursue depositions of a limited number of witnesses that have relevant information concerning WAMY. As you know, since the commencement of discovery, and more recently in the past two years, WAMY has sought numerous extensions of the document production deadline to produce responsive documents and materials. For various reasons, plaintiffs could not proceed with the depositions of WAMY personnel prior to the

completion of WAMY's document production. Now that WAMY has completed its document production as of April 1, 2019, and plaintiffs have the benefit of WAMY's complete production, the PECs would like to schedule the depositions of four individuals to take place within the requested extension period. Those individuals include Saleh al Wohaibi, Abdul Wahab Noorwali, Ibrahim Anwar, and Ibrahim Alshalan.

Plaintiffs have generally consented to WAMY's numerous requests for extensions as a professional courtesy, and hope that WAMY will be similarly agreeable in this instance. Please advise whether WAMY will consent to this reasonable request.

Regards,

Scott

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